

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

INNOVATIVE SOLUTIONS  
INTERNATIONAL, INC., a Washington  
corporation,

Plaintiff,

v.

HOULIHAN TRADING CO., INC., a  
Florida corporation; BRIGHTON GROUP,  
LLC, an Arkansas limited liability  
company; MARCUS TECHNOLOGIES  
LLC, a Texas limited liability company;  
SHUMAKER INTERNATIONAL CORP.,  
a Tennessee corporation; COOK  
INTERNATIONAL TRADE &  
BROKERAGE, INC., a Florida  
corporation; NORTH SOUTH FOODS  
GRP., INC., a Florida corporation;  
HENLEY'S WHOLESALE MEATS, INC.,  
an Arkansas corporation; PILGRIM'S  
PRIDE CORP., a Delaware corporation;  
and DOES 1-10,

Defendants.

Case No.: 2:22-cv-00296-JCC

~~PROPOSED~~ ORDER GRANTING  
MOTION TO FILE UNDER SEAL

**CLERK'S ACTION REQUIRED**

ORDER GRANTING MOTION TO FILE DOCUMENTS UNDER SEAL - 1  
(2:22-cv-00296-JCC)

1 This matter comes before the Court on Plaintiff's motions to seal the transcript of the  
2 deposition of Jason Larson. While the public has a common law right to inspect and copy public  
3 records, including those from judicial proceedings, these rights are not absolute. They must yield  
4 when (1) sealing a document serves a compelling interest, (2) that is substantially likely to be  
5 harmed if the document is not sealed, and (3) there are no less restrictive alternative means for  
6 protecting the interest. *See United States v. Doe*, 870 F.3d 991, 998 (9th Cir. 2017). Given the  
7 sensitive nature of the information contained in the material at issue, these criteria are met here.  
8 Accordingly, Plaintiff's motion to seal is GRANTED and the Clerk is DIRECTED to maintain  
9 Docket Number 286 under seal.

10 DATED this 25th day of October 2024.

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

John C. Coughenour  
UNITED STATES DISTRICT JUDGE

ORDER GRANTING MOTION TO FILE DOCUMENTS UNDER SEAL - 2  
(2:22-cv-00296-JCC)

1 PRESENTED BY:

2 K&L GATES LLP

3 By: s/ Elizabeth H. White

4 Elizabeth H White, WSBA #58976

Henry G. Ross, WSBA #51591

5 1 SW Columbia St., Suite 1900

Portland, OR 97204

6 Phone: 503-228-3200

7 *elizabeth.white@klgates.com*

*henry.ross@klgates.com*

8  
9 Philip M. Guess, WSBA # 26765

Emaan R. Jaber, WSBA # 56990

10 925 Fourth Ave., Suite 2900

Seattle, WA 98104-1158

11 Phone: (206) 623-7580

12 *philip.guess@klgates.com*

*emaan.jaber@klgates.com*

13  
14 *Attorneys for Plaintiff Innovative Solutions*  
*International, Inc.*

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
ORDER GRANTING MOTION TO FILE DOCUMENTS UNDER SEAL - 3  
(2:22-cv-00296-JCC)

**CERTIFICATE OF SERVICE**

I, Elizabeth H White, certify under penalty of perjury under the laws of the State of Washington that on October 25, 2024, I caused to be served a true and correct copy of the foregoing document on:

Bennett J. Hansen  
Daniel Rankin  
Preg O'Donnell & Gillett PLLC  
901 Fifth Avenue Suite 3400  
Seattle, WA 98164-2026  
Email: bhansen@pregodonnell.com  
drankin@pregodonnell.com

☐ Via Email  
☐ Via First Class Mail  
☐ Via Hand Delivery  
☒ Via CM/ECF

Theo A. Lesczynski  
Davis Wright Tremaine, LLP  
920 Fifth Avenue, Suite 3300  
Seattle, WA 98104  
Email: theoleszczynski@dwt.com

☐ Via Email  
☐ Via First Class Mail  
☐ Via Hand Delivery  
☒ Via CM/ECF

Kevin Kuhlman, *pro hac vice*  
Daniel Belgen, *pro hac vice*  
Sarah Hobbs, *pro hac vice*  
Spencer Fane LLP  
1000 Walnut Street, Suite 1400  
Kansas City, MO 64106  
Email: kkuhlman@spencerfane.com  
dblegen@spencerfane.com  
shobbs@spencerfane.com

☐ Via Email  
☐ Via First Class Mail  
☐ Via Hand Delivery  
☒ Via CM/ECF

DATED: October 25, 2024.

s/ Elizabeth H. White  
Elizabeth H White